

**REMARKS**

With this Amendment, Applicants cancel Claims 5 and 14. Therefore, Claims 1-4, 6-13, and 15-28 are all the claims currently pending in the present application.

**Formalities**

The Examiner has indicated that the foreign references listed in the IDS of May 20, 2004, were not considered because the references were not submitted as required by 37 C.F.R. § 1.98(a)(2). Applicants are enclosing a date-stamped receipt which clearly shows the submittal of references with the IDS. Accordingly, Applicants respectfully request that the Examiner consider the foreign references listed in the IDS of May 20. Applicants will be happy to provide the references if the Examiner is unable to obtain them.

Applicants thank the Examiner for acknowledging Applicants' claim to foreign priority and for confirming receipt of the certified copy of the priority document.

Applicants also thank the Examiner for indicating that the drawings filed on March 26, 2004 have been accepted.

**Claim Objections**

Claims 5, 14, and 27 stand objected to because of minor informalities. Claims 5 and 14 are cancelled. Claim 27 has been amended to reflect that the at least one lens cell is a plurality of lens cells that are inclined with respect to the axis of rotation. Applicants respectfully submit that this amendment is not intended to narrow the scope of the original claim, but is rather for precision of language and to explicitly recite within the claim what was believed to have already

been implicitly defined therein. Accordingly, the amendment does not foreclose application of reasonable equivalents.

**Claim Rejections -- §102**

Claims 1, 2, 5, 6, 12, and 14 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by Lambert (US 6,288,815) (“Lambert”). As noted above, Claims 5 and 14 are cancelled.

Regarding independent Claims 1 and 6, which have been amended to include the limitations of Claims 5 and 14 respectively, Applicants submit that Lambert fails to disclose at least “a plurality of lens cells” as recited. Rather, Lambert discloses “a single cylinder lens 43 that is wound in a helix around a drum 42.” (Col. 11, lns. 35-37, emphasis added). Therefore, Applicants submit that Lambert fails to disclose the claimed plurality of lens cells.

Therefore, in view of the above, Applicants submit that Lambert fails to anticipated independent Claims 1 and 6 and that Claims 2 and 12 are patentable at least by virtue of their dependence on Claims 1 and 6, respectively. Applicants respectfully request that the rejection of Claims 1, 2, 6, and 12 be reconsidered and withdrawn.

**Claim Rejections -- §103**

Claim 7 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Lambert, in view of Shibatani (US 6,332,684) (“Shibatani”).

Applicants submit that Shibatani fails to remedy the above-discussed deficiencies of Lambert, and therefore, Claim 7 is patentable at least by virtue of its dependence on Claim 6. Applicants respectfully request that the rejection of Claim 7 be reconsidered and withdrawn.

**Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.


Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

  
Bhaskar Kakarla  
Registration No. 54,627

Date: June 29, 2005